

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

Nicholas Dane Tyson  
**Debtor 1**

Bridgecrest Credit Company, LLC,  
as Servicer for Carvana, LLC  
**Movant(s)**

v.

Nicholas Dane Tyson

**Respondent(s)**

Jack N. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee

**Additional Respondent**

**Chapter 13**

**Case No.** 1:25-BK-01200-HWV

**Matter:** Motion for Relief from the Automatic Stay

**Document No.** 33

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Nicholas Dane Tyson, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Paragraph 1 contains a conclusion of law to which no response is required.
2. Admitted.
3. Upon information and belief, the averments as stated in paragraph 3 are admitted.
4. Paragraph 4 contains a conclusion of law to which no response is required.
5. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in paragraph 5; therefore, it is denied.
6. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in paragraph 6; therefore, it is denied.
7. Upon information and belief, the averment as stated in paragraph 7 is admitted.
8. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in paragraph 8; therefore, it is denied.
9. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in paragraph 9; therefore, it is denied.

10. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in paragraph 10; therefore, it is denied.

11. Paragraph 11 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,  
**DETHLEFS PYKOSH & MURPHY**

Date: August 29, 2025

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire  
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Camp Hill, PA 17011  
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*Attorney for Debtor(s)*

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**CERTIFICATE OF SERVICE**

I hereby certify that on Friday, August 29, 2025, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Eliza Garifullina, Esquire  
Orlans Law Group  
200 Eagle Road, Suite 120  
Building 2  
Wayne, PA 19087  
*Counsel for Movant(s)*

Jack N. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Office of the United States Trustee  
Sylvia H. Rambo United States Courthouse  
1501 North Sixth Street, Floor 3  
Harrisburg, PA 17102

/s/ Kathryn S. Greene

Kathryn S. Greene, M-Jur., RP®, Pa.C.P.  
Paralegal for Paul D. Murphy-Ahles, Esquire